IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LAWRENCE E. FELDMAN d/b/a LAWRENCE E. FELDMAN & ASSOCIATES v. GOOGLE, INC.	:	No. 06-cv-2540

ORDER

AND NOW this day of , 2006, upon consideration of Plaintiff's Motion for Extension of Time in Which to Respond to Defendant Google, Inc.'s Supplemental Memorandum in Support of Motion to Dismiss Amended Complaint, and any response thereto, it is hereby ORDERED and DECREED that the motion is GRANTED.

Plaintiff shall have ten (10) days in which to respond to Defendant Google, Inc's Supplemental Memorandum.

SO ORDERED.

BY THE COURT:

____

JAMES T. GILES

Dockets.Justia.com

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LAWRENCE E. FELDMAN d/b/a LAWRENCE E. FELDMAN & ASSOCIATES v. GOOGLE, INC.	No. 06-cv-2540

MOTION FOR EXTENSION OF TIME IN WHICH TO RESPOND TO DEFENDANT GOOGLE'S MEMORANDUM OF LAW IN SUPPORT OF MOTION TO DISMISS AMENDED COMPLAINT

Plaintiff Lawrence E. Feldman & Associates hereby submits the following Motion for Extension of Time in Which to Respond to the submission of Defendant Google, Inc.

1. On November 1, 2006 the parties attended oral argument on Google, Inc.'s Motion to Dismiss the Amended Complaint in this matter.

2. At argument, this Court converted the pending Motion to Dismiss to one for Summary Judgement. *See,* Trans. of Proceedings before Hon. Judge James T. Giles, dated November 1, 2006, a true and correct copy of which is attached hereto as Exhibit A.

3. On November 2, 2006 the Court directed the parties to provide information specified by the Court at oral argument within fifteen (15) days of the date of the oral argument, or November 16, 2006. Also in that Order, the Court informed the parties that no further argument was required. *See, Order Sur Hon. Judge James T. Giles,* Nov. 2, 2006, attached hereto as Exhibit B.

4. Plaintiff's counsel contacted defendant's counsel to propose a joint submission, but defendant refused.

5. Defendant filed additional argument, entitled "Defendant Google, Inc.'s Supplemental Memorandum of Law in Support of Motion to Dismiss Amended Complaint."

6. That memorandum also contained the Affidavit of Annie Hsu, Adwords Associate for Google, Inc.

7. Plaintiff did not receive defendant Google's submission until Monday, November 20, 2006. Plaintiff telephoned Google's counsel to obtain its assent to this extension of time, but counsel was not available.

8. Consequently, Plaintiffs are requesting a brief extension of time in which to respond to Google's submission and points of authority contained in their memorandum of law.

Dated: November 20, 2006

Respectfully submitted,

By: ______________________

Lawrence E. Feldman
William Angle
432 Tulpehocken Avenue
Elkins Park, PA 19027
(215) 885-3302
(215) 885-3303(fax)

Attorneys for Plaintiff

CERTIFICATION OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Motion for Extension of Time was served upon the individual(s) listed below via first class mail, postage pre-paid.

Jeff Lindy, Esquire
Lindy & Associates
1800 JFK Boulevard
Suite 1500
Philadelphia, PA 19103

Counsel for Defendant Google, Inc.

Dated: November 20, 2006